IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING () RMG FOAMS PRODUCTS LIABILITY ()	MDL No. 2:18-mn-2873-
LITIGATION)	
)	
	This Document Relates to All Actions
)	

JOINT MOTION FOR ENTRY OF CASE MANAGEMENT ORDER RELATED TO LEACH (CMO 26) PLAINTIFFS

The Defense Co-Leads and Defense Coordinating Committee and the Plaintiffs' Executive Committee (collectively, the "Parties") jointly move for entry of the Proposed Case Management Order No. 26E. In support of this motion, the Parties state as follows:

- 1. On May 5, 2023, this Court entered Case Management Order No. 26 to govern the Second Bellwether Program: Initial Personal Injury Claims [ECF No. 3080].
- 2. Since the entry of that Order, CMO 26 has been amended and/or supplemented five times [ECF Nos. 3735, 4134, 4276, 4297, and 4964].
- 3. Following extensive negotiations, the parties have conferred and agreed on the entry of a sixth amendment, Case Management Order No. 26E, attached here, which sets forth revised general schedules for Tier 2 Discovery for Group A and Group B *Leach* cases.

WHEREFORE, the Parties respectfully request that the Court enter the proposed Case Management Order No. 26E, attached as Exhibit A.

Dated: October 3, 2024 Respectfully submitted,

<u>/s/ Fred Thompson</u> <u>/s/ Michael A. Olsen</u>

Fred Thompson Michael A. Olsen
Motley Rice LLC Mayer Brown LLP
28 Bridgeside Blvd. 71 South Wacker Drive

Mount Pleasant, SC 29464 P: (843) 216-9658 fthompson@motleyrice.com

Plaintiffs' Liaison Counsel

Michael A. London Douglas & London, P.C. 59 Maiden Lane, 6th Fl. New York, New York 10038 P: (212) 566-7500 mlondon@douglasandlondon.com

Paul J. Napoli Napoli Shkolnik 1302 Avenida Ponce de Leon Santurce, Puerto Rico 00907 P: (833) 271-4502 pnapoli@nsprlaw.com

Scott Summy
Baron & Budd, P.C.
3102 Oak Lawn Avenue
Suite 1100
Dallas, TX 75219
P: (214) 521-3605
ssummy@baronbudd.com

Joseph F. Rice Motley Rice LLC 28 Bridgeside Blvd Mount Pleasant, SC 29464 P: (843) 216-9000 jrice@motleyrice.com

Co-Lead Counsel for Plaintiffs

Chicago, IL 60606 P: (312) 701-7120 molsen@mayerbrown.com

Joseph G. Petrosinelli

Williams & Connolly LLP 725 Twelfth Street, N.W. Washington DC 20005 P: (202) 434-5547 jpetrosinelli@wc.com

Co-Lead Counsel for Defendants